

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE APPLICATION OF KARAM SALAH :
AL DIN AWNI AL SADEQ FOR AN ORDER :
UNDER 28 U.S.C. § 1782 TO CONDUCT :
DISCOVERY FOR USE IN FOREIGN :
PROCEEDINGS :
: Civil Action No. 1:20-mc-275-JPO
: Hon. J. Paul Oetken
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**NOTICE OF MOTION BY DECHERT LLP TO QUASH *EX PARTE* SUBPOENA
ISSUED PURSUANT TO 28 U.S.C. § 1782**

PLEASE TAKE NOTICE that, pursuant to Rule 45 of the Federal Rules of Civil Procedure and 28 U.S.C. § 1782, Dechert LLP shall move this court before the Honorable J. Paul Oetken for an order quashing the *ex parte* subpoena issued by Karam Salah Al Din Awni Al Sadeq pursuant to 28 U.S.C. § 1782 or, in the alternative, an order deferring enforcement of the subpoena or modifying the subpoena. This motion is supported by Dechert LLP's Memorandum of Law, declarations from Edward John Whitney Allen, James Croock, and Benjamin Rosenberg, and all materials submitted by Mr. Al Sadeq in support of his application for assistance under 28 U.S.C. § 1782.

Dated: New York, New York
October 6, 2020

/s/ Benjamin Rosenberg
Benjamin Rosenberg
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